

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation,  
AMAZON.COM SERVICES LLC, a Delaware  
limited liability company, and AMAZON  
TECHNOLOGIES, INC., a Nevada corporation,

Plaintiffs,

v.

Does 1-20, unknown parties doing business as  
“REKK,” and the following individuals: Oscar  
Pineda, Janiyah Alford, Noah Page, Skylar  
Robinson, William Walsh, Luke Colvin,  
Alejandro Taveras, Andrew Ling, Brandon  
Sukhram, Charalampos Gkatzoulas, Cosmin  
Sopca, Dylan Hinz, Eric Niezabytowski, Graham  
Ferguson, Ivona Brazovskaja, James Garofalo,  
Jenny Tran, Johanes Kessel, Jorge Correa, Josh  
Davis, Karcper Niepogoda, Olaf Booij, Ryan  
Bates, Sai Charan Beeravelli, Simone Antonio  
Figura, Zachary Iguelmamene, and Zoha Ahmed,

Defendants.

No. 2:23-cv-01879-JLR

STIPULATED PERMANENT  
INJUNCTION AS TO  
DEFENDANT JANIYAH  
ALFORD AND ~~PROPOSED~~  
ORDER

NOTED FOR CONSIDERATION:  
March 4, 2024

*Without Oral Argument*

**STIPULATION**

Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and Amazon Technologies,  
Inc. (together, “Amazon”), and Defendant Janiyah Alford (“Alford”) and (collectively “Settling  
Parties”), by and through Amazon’s respective counsel of record and by Alford’s pro-se

1 representation, notify the Court that the Settling Parties have reached a settlement of all claims  
2 between them in this matter. Pursuant to the terms of that settlement, the Settling Parties  
3 stipulate and agree to entry of the permanent injunction below.

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1 DATED: 3/4/2024.

2 Davis Wright Tremaine LLP  
3 Attorneys for Plaintiffs Amazon.com

Defendant

4 By s/Bonnie MacNaughton  
5 Bonnie MacNaughton, WSBA #36110  
6 Tim Cunningham, WSBA #50224  
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DocuSigned by:  
  
EED2B369E08D486  
By s/ Janiyah Alford  
Janiyah Alford  
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15 **PERMANENT INJUNCTION**

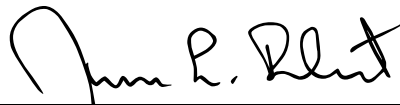
16 Pursuant to the above stipulation of the parties, IT IS HEREBY ORDERED that  
17 Defendant Janiyah Alford, and her respective employees, agents, successors and assigns, and all  
18 others in active concert or participation with her, are permanently enjoined and restrained from:

- 19 1. Accessing and using, whether directly or indirectly via a third party, intermediary,  
20 or proxy, Amazon.com, or any other Amazon online store around the world;
- 21 2. Being employed by Amazon;
- 22 3. Exploiting or abusing Amazon's ordering or return services;
- 23 4. Making false statements or misrepresentations to Amazon;
- 24 5. Engaging in any activity that defrauds Amazon into paying money or providing  
25 replacement products for illegitimate returns;
- 26 6. Engaging in any scheme or malicious activity that interacts with Amazon; and
- 27 7. Knowingly and materially assisting or engaging any other person or business  
entity in engaging in or performing any of the activities listed above.

1 The Court shall retain continuing jurisdiction over this matter for the limited purposes of  
2 enforcing the terms of the Settling Parties' settlement agreement and this Stipulated Permanent  
3 Injunction.

4 IT IS SO ORDERED.

5 DATED: March 5, 2024.

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9 The Honorable James L. Robart  
10 UNITED STATES SENIOR DISTRICT JUDGE  
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